

09:42:17

1 Q. Well, just -- yeah, I mean, anybody.

09:42:18

2 A. When you say talk about it, do -- what are you  
3 referring to? I don't --

09:42:21

09:42:22

4 Q. Well, good question. Let me kind of go back.

5 A. Okay.

09:42:25

09:42:28

6 Q. When you were preparing for -- for today, did  
7 you talk to anybody to prepare for your deposition?

09:42:32

09:42:38

8 A. Are you asking did I talk about the -- probably  
9 questions or things like that?

09:42:39

09:42:42

10 Q. Well, how did you prepare for today, if you  
11 did?

09:42:42

09:42:46

12 A. I just reviewed the interrogatories that I  
13 received. That's all I did.

09:42:49

09:42:51

14 Q. Okay. Did you review them with anybody?

09:42:58

09:43:03

09:43:06

09:43:10

15 A. No. No, I didn't.  
16 Q. So the -- would it be safe to say that the  
17 documents that you reviewed prior to your deposition  
18 are the documents that you, through your attorney, sent  
19 to me in response to discovery requests?

09:43:13

09:43:15

09:43:17

09:43:22

20 A. That's right.

21 Q. Okay. Was there -- is there any other  
22 documents that might be outstanding that you reviewed  
23 that were not given to me?

24 A. No.

09:43:25

25 Q. Okay. So everything that we received is all

09:43:28

1 the documentation you have?

09:43:31

2 A. That's it. Right.

09:43:31

3 Q. That's it. Okay. So there's nothing else?

09:43:33

4 A. Nothing else.

09:43:38

5 Q. All right. And can we have an agreement that

09:43:40

6 if you do find other documents that -- that might be

09:43:43

7 responsive to those requests or that are related to

09:43:45

8 this matter, that you would let your attorney know that

09:43:48

9 so that I could have them?

09:43:50

10 A. Yes, I will.

09:43:52

11 Q. Well, how much time did you spend in preparing

09:43:56

12 for today, would you say?

09:43:59

13 A. Total amount of time? It -- it was like -- I

09:44:08

14 would look at the information certain nights and I

09:44:12

15 might spend 45 minutes to an hour each time. So I

09:44:16

16 would say between maybe three to five hours, possibly

09:44:23

17 more. I'm not certain. I didn't really pay attention

09:44:27

18 to that.

09:44:29

19 Q. Sure. And there's plenty of other more fun

09:44:33

20 things to be doing.

21 A. Yes.

09:44:34

22 Q. And I think your attorney is looking at your

09:44:37

23 chair because it's squeaking.

09:44:38

24 A. Oh, that's the chair. I'm sorry.

09:44:40

25 Q. No, it's not your fault.

09:44:41

1 A. I didn't realize I was doing that.

09:44:46

2 MR. WAObIKEZE: Do you mind if I adjust your  
3 chair?

09:44:48

09:44:48

4 MS. HISEL: No, that's that chair. Would you  
5 -- would you like to switch chair?

09:44:48

09:44:50

6 MR. WAObIKEZE: No. I thought it was coming  
7 from next door.

09:44:51

09:44:52

8 A. I didn't even hear it. I was just listening to  
9 you.

10 BY MS. HISEL:

09:44:56

11 Q. You were focused.

09:44:57

12 A. I was focused on you.

09:44:58

13 Q. And that's good. All right. So -- so you  
14 would say three to five hours?

09:45:00

09:45:02

15 A. I think, yeah. That's an estimate.

09:45:06

16 Q. Okay. So for any of that time preparing, did  
17 you talk to your attorney?

09:45:09

18 A. No.

09:45:11

19 Q. So your attorney didn't help you prepare in any  
20 way today -- for today's deposition?

09:45:14

09:45:17

21 A. The only -- I had some questions when I went to  
22 the office regarding trying to understand the questions  
23 and that's all.

09:45:22

09:45:27

09:45:28

24 Q. Sure. And really that was for discovery;

09:45:32

25 right?

09:45:32

1 A. Right.

09:45:33

2 Q. Not so much for today?

09:45:35

3 A. Right.

09:45:36

4 Q. Okay. Well, how did you come to hear about

09:45:40

5 Mr. Waobikeze?

09:45:41

6 A. I searched and searched and I kept going back

09:45:45

7 to the website. I just kept searching and reviewing

09:45:51

8 and looking at it.

09:45:52

9 Q. So you -- you found out about him through the

09:45:56

10 website, through his firm website?

09:45:58

11 A. Right.

09:45:58

12 Q. And what about that website kind of attracted

09:46:03

13 you to --

09:46:05

14 A. I don't even recall, to be honest with you,

09:46:08

15 because at that point, I just needed some help and I

09:46:11

16 just don't know what it was, to be honest with you

09:46:13

17 right now.

09:46:14

18 Q. Okay. Who all knows that you are having a

09:46:18

19 deposition today?

09:46:19

20 A. My sister knows and she's the only one that I

09:46:25

21 know who would know because --

09:46:30

22 Q. And who is your sister?

09:46:32

23 A. Regina Sanders.

09:46:36

24 Q. And does she live here in San Antonio?

09:46:38

25 A. She lives in Schertz.



09:46:41

1 Q. Okay. Any current or former Judson employees  
2 know that you're taking your deposition today?

09:46:48

09:46:51

3 A. No.

09:46:52

4 Q. That you're aware of?

09:46:53

5 A. Not that I'm aware of.

09:46:56

6 Q. Okay. So did you talk to Virginia Brown about  
7 your deposition today?

09:47:00

09:47:02

8 A. No, I didn't.

09:47:03

9 Q. And who is Virginia Brown?

09:47:05

10 A. She is a teacher assistant there at Woodlake.

09:47:13

11 Q. Is she currently employed at -- in that  
12 position?

09:47:16

09:47:16

13 A. I don't know.

09:47:17

14 Q. Don't know okay. Robin Snyder?

09:47:21

15 A. A former secretary.

09:47:26

16 Q. And did you talk to her about your deposition?

17 A. No.

09:47:30

18 Q. And when you say a former secretary, former  
19 secretary to you when you were employed at Judson?

09:47:34

09:47:36

20 A. Oh, no. I didn't have a secretary. She was  
21 the principal's secretary.

09:47:39

09:47:40

22 Q. Okay. So she would have been Ms. Verna  
23 Ruffin's secretary?

09:47:43

09:47:44

24 A. That's right.

09:47:44

25 Q. Okay. And do you know if she's still there?

09:47:46

1 A. No, she's not. She's been gone for several  
2 years.

09:47:51

09:47:52

3 Q. Okay. Staci Decuir?

4 A. No.

09:47:57

5 Q. And she is a teacher at Judson?

09:48:00

6 A. She's a -- yes.

09:48:03

7 Q. Joyce Sweet?

8 A. No.

09:48:06

9 Q. Didn't talk to her. And is she still a teacher

09:48:10

10 at Judson?

09:48:10

11 A. To my knowledge, yes.

09:48:13

12 Q. Okay. Dan Garza, did you talk to him?

13 A. No.

09:48:17

14 Q. Do you know if he's still a teacher at Judson?

15 A. No.

09:48:21

16 Q. You don't know?

09:48:22

17 A. No, he's not.

09:48:23

18 Q. He's not?

09:48:23

19 A. Unless he's back there, but no.

09:48:28

20 Q. Marilyn McKinney, did you talk to her about

09:48:32

21 your deposition?

09:48:33

22 A. No.

09:48:37

23 Q. Okay. And it says that she's a grievance chair

09:48:39

24 for Judson. Is she still employed with Judson in that

09:48:43

25 capacity?

09:48:43

1 A. I'm not sure about that capacity, but I think  
2 she's still employed there.

09:48:47

09:48:50

3 Q. Okay. Okay. Are you aware of any  
4 tape-recorded conversation between you and anybody at  
5 Judson?

09:48:56

09:49:03

6 A. No, I'm not.

09:49:04

09:49:06

7 Q. Okay. Do you have any diaries or notes or  
8 memorandums that you kept personally regarding the  
9 subject of this lawsuit or during your time that you  
10 were employed at Judson?

09:49:12

09:49:17

09:49:20

09:49:23

11 A. I think I gave some memorandums to my  
12 attorneys. But as far as diaries, I don't have any  
13 diaries --

09:49:26

09:49:28

14 Q. Okay.

09:49:30

15 A. -- or notes.

09:49:31

16 Q. Or journals or anything like that?

09:49:32

17 A. No journals, no. I didn't keep journals or  
18 diaries.

09:49:36

09:49:39

19 Q. All right. Let's kind of look a little bit  
20 about some general background information.

09:49:42

09:49:44

21 Ms. Garrett, where were you born and raised?

09:49:46

22 A. In Alabama.

23 Q. Okay.

09:49:48

24 A. Birmingham.

09:49:52

25 Q. And, Ms. Garrett, are you -- are you married?

09:49:55

1 A. No.

09:49:56

2 Q. Okay. Do you have any children?

3 A. No.

09:50:02

4 Q. Have you ever been married?

5 A. Yes.

09:50:05

6 Q. Okay. Are your parents still living?

7 A. No.

09:50:12

8 Q. Do you have any siblings?

9 A. Yes.

09:50:16

10 Q. Besides your sister that you mentioned?

09:50:23

11 A. Right.

09:50:23

12 Q. Ms. Sanders?

13 A. Yes.

09:50:25

14 Q. Is that your only sibling?

09:50:27

15 A. No.

09:50:27

16 Q. Who are your other siblings?

09:50:29

17 A. You want names?

09:50:30

18 Q. Sure.

09:50:30

19 A. Okay. Paulette Richardson.

20 Q. Okay.

09:50:35

21 A. Betty Garrett, Donna Garrett, and my brother,

09:50:47

22 Charlie Garrett, Jr.

09:50:51

23 Q. And are they all living?

24 A. Yes.

09:50:54

25 Q. And do they live in San Antonio area?